

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DARTH NEWMAN,	)	
	)	Civil Action No. 2:20-cv-01973-RJC
Plaintiff,	)	
	)	Honorable Robert J. Colville
v.	)	
	)	
POLLOCK COHEN, LLP,	)	
STEVE COHEN,	)	
CHRISTOPHER K. LEUNG, and	)	
ADAM POLLOCK,	)	
	)	
Defendants.	)	

**JOINT STATUS REPORT**

The Parties, by and through undersigned counsel, and pursuant to the Court's February 11, 2021 Order, hereby file the following Joint Status Report.

Defendants' counsel proposed filing the following report, to which Plaintiffs' counsel does not agree:

1. On December 18, 2020, Defendants removed this litigation to this Court from the Court of Common Pleas of Allegheny County. (ECF Doc No. 1).
2. On January 13, 2021, Plaintiff filed his Renewed Motion for Preliminary Injunction. (ECF Doc. No. 8).
3. Before the status conference on February 11, 2021, the Parties conferred and attempted to reach an agreement that would obviate the need for the Court to rule on Plaintiff's Preliminary Injunction Motion; but the Parties were unable to find a mutually agreeable solution.
4. After the status conference, the Parties conferred again in an effort to reach an agreement.
5. The Parties were unable to agree on an arrangement that would eliminate the need

for ruling on Plaintiff's Preliminary Injunction Motion.

Defendants' counsel objected to Plaintiff's counsel's proposed report below on the grounds that a joint status report is not an appropriate mechanism for adversarial arguments. In response to Plaintiff's report below, Defendants' counsel note only that Plaintiff's counsel did not contact Defendants' counsel between February 11, 2021 and February 22, 2021 either.

Plaintiff's counsel proposed filing the report below to which Defendants' Counsel does not agree:

1. On December 18, 2020, Defendants removed this litigation to this Court from the Court of Common Pleas of Allegheny County. (ECF Doc No. 1).

2. On January 13, 2021, Plaintiff filed his Renewed Motion for Preliminary Injunction. (ECF Doc. No. 8).

3. Before the status conference on February 11, 2021, the Parties conferred and attempted to reach an agreement that would obviate the need for the Court to rule on Plaintiff's Preliminary Injunction Motion. However, at the time of the status conference the Parties were still working out the details to a proposed resolution.

4. On February 11, 2021, Plaintiff's counsel sent Defendants' counsel an email asking for additional information about the proposed terms of the resolution. Plaintiff had agreed to the Defendants' framework but Defendants' framework lacked important details and terms. Plaintiff never received the additional requested information.

5. On February 22, 2021, the Parties communicated via email and at approximately 4 p.m., Defendants' counsel contacted Plaintiff's counsel and stated that Defendants withdrew their offer and did not plan to put forth an alternative resolution unless Plaintiff provided them with additional case law and authority to support his Motion for Preliminary Injunction.

6. Plaintiff did not provide Defendants with any additional case law or authority and Defendants were not willing to engage in additional discussion.

7. The Parties were unable to agree on an arrangement that would eliminate the need for ruling on Plaintiff's Preliminary Injunction Motion.

Dated: February 22, 2021

Respectfully submitted,

MCELROY LAW FIRM LLC

JACKSON LEWIS P.C.

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